

EXHIBIT A

UBS Securities LLC et al. v. Dondero et al.: Turnover Petition Exhibit A
Selected Violations of 18 U.S.C. §§ 1343 (Wire Fraud)

	<u>Ex. No.</u>	<u>Date</u>	<u>Sender</u>	<u>Recipients</u> (selected)	<u>Purpose</u>	<u>Description</u>
A. The 2010 CLO HoldCo Fraudulent Conveyance						
1.	Ex. 27, Email from T. Surgent, at UBSHCDO- 050972 (Dec. 10, 2010)	12/10/2010	Helen Kim (Dondero's assistant at HCM)	Thomas Surgent (Assistant General Counsel at HCM), Frank Waterhouse (Chief Financial Officer at HCM)	Communications sent on behalf of Dondero to facilitate fraudulent transfers in furtherance of scheme to defraud UBS	Email from Helen Kim, Dondero's assistant, asking a Cayman law firm to form CLO HoldCo, Ltd., in the next 2- 3 days with Grant Scott as director. Thomas Surgent forwards to Frank Waterhouse.
2.	Ex. 28, Email from H. Kim, at UBSHCDO- 015352, -54, -55 (Dec. 14, 2010)	12/14/2010	Helen Kim	Thomas Surgent, Frank Waterhouse, Mark Patrick (Tax Counsel at HCM)	Communications sent on behalf of Dondero to facilitate fraudulent transfers in furtherance of scheme to defraud UBS	Helen Kim asks Cayman counsel for the incorporation documentation. Once she receives, she forwards to Carter Chism (Director of Operations at HCM) and clarifies that CLO HoldCo would be 100% owned by Dondero- controlled parent, Highland Capital Management Partners Charitable Trust #2.
3.	Ex. 29, Email from A. Alvarez, at UBSHCDO- 135396 (Dec. 16, 2010)	12/14/2010	Frank Waterhouse	Adriana Alvarez (Executive Accountant at HCM), Mark Patrick	Communications sent by Enterprise associate to facilitate fraudulent transfers in furtherance of scheme to defraud UBS	Frank Waterhouse requests to open a new cash account for CLO HoldCo as it "will be entering into an investment transaction next week." Two days later, Adriana Alvarez responds with CLO HoldCo's new cash account information.

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4.	Ex. 32, Email from M. Okolita, at UBSHCDO- 125280 (Dec. 21, 2010)	12/21/2010	Matthew Okolita (Chief Compliance Officer at HCM)	Matthew Okolita	Communications sent to facilitate fraudulent transfers in furtherance of scheme to defraud UBS	Matthew Okolita confirms that Dondero would contribute approximately 16% of value for CLO HoldCo and indicates that he raised doubts to Dondero and Waterhouse that this transaction was at arm's length when Dondero controlled the terms of the note and no one reviewed them.
5.	Ex. 33, Email from A. Alvarez, at UBSHCDO- 053637 (Dec. 22, 2010)	12/22/2010	Adriana Alvarez	Fareena Syed (Senior Personal Banker at NexBank)	Communications sent on behalf of Dondero to facilitate fraudulent transfers in furtherance of scheme to defraud UBS	Adriana Alvarez confirms sending \$6,597,862 wire from Dondero-controlled HCM Charitable Trust #2 to finance CLO HoldCo's purchase of CDO Holding's assets.
6.	Ex. 96, CDO Holding Balance Sheet, tab "200.5 CDO CF," Row 1478 at UBSPROD4 957189	12/31/2010	---	---	Documentation of the 2010 fraudulent transfers sent via interstate wires in furtherance of scheme to defraud UBS	Spreadsheet reflecting transfers between December 31, 2009 and December 31, 2010, including the 2010 CLO HoldCo Fraudulent Conveyance. The spreadsheet shows that CDO Holding conveyed to CLO HoldCo virtually all of its assets, while adding a new intercompany receivable from CLO HoldCo in the amount of \$32,801,593 and demonstrating that on December 23, 2010, CDO Holding recorded a "sale" of "CDO HoldCo Assets" to CLO HoldCo in exchange for \$6,597,862.

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7.	Ex. 35, Email from C. Chism, at UBSHCDO- 212471-73, - 75 (Jan. 5, 2011)	01/05/2011	Carter Chism	Clifford Stoops (Chief Accounting Officer at HCM)	Communications sent on behalf of Dondero to facilitate fraudulent transfers in furtherance of scheme to defraud UBS	Carter Chism forwards to Clifford Stoops an email chain with required compliance paperwork for the 2010 CLO HoldCo Fraudulent Conveyance, including a compliance report signed by Dondero and a signed written resolution of CDO Holding's sole shareholder, Dondero, approving of the transfer. Dondero justifies transferring CDO Holding's entire asset portfolio based on "[l]iquidity."
B. The 2017 Fraudulent Conveyances To Sentinel						
8.	Ex. 37, Email from S. Vitiello, at UBSPROD4 837429 (Apr. 11, 2017)	4/11/2017	Stephanie Vitiello (In- House Counsel at HCM)	Isaac Leventon (Assistant General Counsel at HCM)	Communications between Enterprise associates to create fraudulent ATE Policy at Ellington's direction in furtherance of scheme to defraud UBS	Vitiello and Leventon exchange draft of a presentation pitching the ATE Policy "[b]ased on our discussion with [Ellington]" and prepared in advance of another meeting with Ellington.
9.	Ex. 38, Email from I. Leventon, at HCMUBS0 05287 (Apr. 12, 2017)	4/12/2017	Isaac Leventon	Stephanie Vitiello	Communications between Enterprise associates to create fraudulent ATE Policy at Ellington's direction in furtherance of scheme to defraud UBS	Vitiello and Leventon exchange a revised draft of the presentation after meeting with Ellington that shows a purchase of "\$100m ATE policy from Sentinel" with "ATE premium = all assets in HFP/CDO Fund."

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10.	Ex. 42, Email from P. Kranz, at BC SEN000074 5902 (Aug. 8, 2017)	08/08/2017	JP Sevilla (Assistant General Counsel at HCM)	Paul Scrivener (Independent Consultant at Solomon Harris); Pete Kranz (Executive Managing Director and Captive Practice Leader at Beecher Carlson)	Communications from Enterprise associate to create the fraudulent ATE Policy in furtherance of scheme to defraud UBS	In response to an email from outside counsel flagging that the transfer of Judgment Debtor assets pursuant to the ATE Policy would result in the assets being “put beyond the reach of the plaintiffs in the [Underlying Action] against the [F]unds,” Sevilla directs Solomon Harris to add language that the ATE Policy will cover the Insureds own costs and expenses and to remove language that “it’s an exclusion if the insured does not have funds to prosecute the action.” Kranz responds to say he has no issue with consolidating the ATE Policy.
11.	Ex. 44, Email from K. Irving, at HCMUBS0 00349 (Aug. 10, 2017)	8/10/2017	Lesley Thompson (Director at Sentinel)	JP Sevilla; Katie Irving (Director in Legal Department at HCM)	Communications documenting the execution of the fraudulent ATE Policy and APA by Sentinel in furtherance of scheme to defraud UBS	Lesley Thompson, as a director of Sentinel, sends the directors’ resolution and executed signature pages for the ATE Policy and APA. Irving asks Helen to get Dondero to execute on behalf of the Judgment Debtors.
12.	Ex. 43, Email from J. Sevilla, at UBSPROD2 566503 (Aug. 10, 2017)	8/10/2017	Helen Kim	JP Sevilla; Katie Irving	Communications documenting the execution of the fraudulent ATE Policy and APA by Dondero in furtherance of scheme to defraud UBS	Helen Kim sends Sevilla and Irving an executed version of the ATE Policy and APA where Dondero signs on behalf of the Judgment Debtors. Sevilla then responds to confirm receipt.
13.	Ex. 46, Email from D. Willmore, at HCMUBS0 00563 (Aug. 11, 2017)	08/11/2017	David Willmore (Senior Manager, Fund Analysis at HCM)	Katie Irving, JP Sevilla, Isaac Leventon	Communications between Enterprise associates to facilitate the 2017 fraudulent transfers in furtherance of scheme to defraud UBS	In response to Sentinel’s wiring instructions sent by Irving, David Willmore confirms to Sevilla, Leventon, and Irving that wires have been initiated “to move all of CDO Fund’s cash to Sentinel.”

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14.	Ex. 47, Email from T. Loiben, at HCMUBS0 00947, (Aug. 14 2017 16:57)	08/14/2017	Tara Loiben (Executive Assistant to Jim Dondero)	Helen Kim	Communications sent at Dondero's direction to facilitate the 2017 fraudulent transfers in furtherance of scheme to defraud UBS	While assigning the CLO HoldCo promissory note to Sentinel (in fulfillment of the premium), Dondero attempts to sign on behalf of both Sentinel and CDO Holding.
15.	Ex. 65, Email from C. Price (attaching Executed ATE Policy), at BC SEN000009 2419 (March 4, 2019)	3/4/2019	Clayton Price (General Manager at BC Cayman)	Sehlielo Dube (Chief Analyst at CIMA), Silvanous Inyangala (Senior Analyst at CIMA)	Communications sent in furtherance of scheme to defraud UBS	Sentinel sends CIMA an executed version of the fraudulent ATE Policy.
C. The 2018 Fraudulent Adjustments to the Insurance Policy						
16.	Ex. 53, Email from J. Sevilla, at BC SEN000076 7181 (Nov. 20, 2017)	11/20/2017	JP Sevilla	Pete Kranz	Communications sent by Enterprise associates to make fraudulent adjustments to the ATE Policy in furtherance of scheme to defraud UBS	Sevilla emails Beecher and attaches a letter from CDO Fund that appoints Beecher as its "exclusive representative" regarding the ATE, even though Beecher already represents Sentinel. Ellington signs on behalf of CDO Fund.

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17.	Ex. 55, Email from T. Adamczak, at BC SEN000070 7455 (June 6, 2018)	06/05/2018	Tom Adamczak (Accounting Manager at Beecher Carlson)	JP Sevilla, Matt DiOrio (Director at HCM, Director at Sentinel), Alli Devins (Accountant at Beecher Carlson)	Communications sent by Enterprise associates to make fraudulent adjustments to the ATE Policy in furtherance of scheme to defraud UBS	Beecher Carlson flags to DiOrio and Sevilla that Sentinel's premium had been <i>overpaid</i> by millions, "giv[ing] rise to the question 'is this an arms-length transaction?'" In response, Sevilla floats the idea of raising the premium to cover the fraud.
18.	Ex. 56, Email from T. Adamczak, at DISCSEN00 05592 (June 27, 2018)	06/27/2018	Tom Adamczak	Lesley Thompson; JP Sevilla	Communications sent by Enterprise associates to make fraudulent adjustments to the ATE Policy in furtherance of scheme to defraud UBS	Beecher, Sentinel directors, and Sevilla discuss Sentinel "ATE endorsement 1" which changes the premium. Lesley Thompson notes that the plan is for the Board to execute the resolution before settling on a final number.
19.	Ex. 57, Email from L. Thompson, at BC SEN000072 3353 (July 11, 2018)	07/11/2018	Lesley Thompson	Tom Adamczak Matt DiOrio; Andrew Dean (Director at Sentinel); JP Sevilla	Communications sent regarding fraudulent adjustments to the ATE Policy in furtherance of scheme to defraud UBS	Beecher, Sentinel directors, and DiOrio, Sevilla, and Irving discuss "Sentinel ATE endorsement #2" which changes the premium again and drops coverage limit. Sentinel's independent director Lesley Thompson questions why the premium level has changed several times "[i]f the company was willing to write the risk at the original deemed premium value?" Thompson states that "the company should keep the liability limits at the originally agreed level." Ultimately, Thompson approves the reduction.
20.	Ex. 58, Email from T. Adamczak, at BC SEN000012 4692 (July 16, 2018)	7/16/2018	Tom Adamczak	Allison Bohrman (Audit Manager at Crowe), Alli Devins	Documentation of fraudulent adjustment to the insurance policy	Beecher forwards to outside counsel Sentinel's unanimous written resolutions of the Board of Directors of the Company to approve the endorsement of the ATE to remove USD 9 million from premium.

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21.	Ex. 59, Email from T. Adamczak, at BC SEN000065 5524 (July 23, 2018)	7/23/2018	Matt DiOrio	Tom Adamczak; JP Sevilla	Misrepresentation by Enterprise associates to cover up ATE Policy fraud in furtherance of scheme to defraud UBS	DiOrio materially misrepresents to auditors Dondero's economic interest in the Funds, stating that the ultimate owners of the Insureds are not the same as those at Sentinel. Adamczak then forwards this misrepresentation to Lisa Rivoire at Crowe.
22.	Ex. 64, Email from M. DiOrio, at BC SEN000063 9191 (Jan. 31, 2019)	01/31/2019	Matt DiOrio	Tom Adamczak	Misrepresentation by Enterprise associates to cover up ATE Policy fraud in furtherance of scheme to defraud UBS	DiOrio attaches falsified board meeting minutes to prepare for CIMA inspection, signed after the fact by Ellington, in order to cover up failure to fulfill reporting requirements.
D. The 2019 Fraudulent Conveyance To Sebastian Clarke						
23.	Ex. 82, Email from M. DiOrio, at BC SEN000063 8651 (Mar. 19, 2020)	12/31/2019	Matt DiOrio, JP Sevilla	John Cullinane (Director at Sebastian Clarke); David Egglishaw (Director at Sebastian Clarke)	Communications sent to orchestrate fraudulent transfer of Judgment Debtor assets to Sebastian Clarke in furtherance of scheme to defraud UBS	DiOrio and Sevilla urgently request that the directors of Sebastian Clarke approve the transfer of assets fraudulently marked as zero for minimal consideration to funnel assets away from UBS.

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24.	Ex. 82 Email from M. DiOrio, at BC SEN000063 8650-51 (Mar. 19, 2020)	12/31/2019	Matt DiOrio	JP Sevilla, Katie Irving, John Cullinane, David Egglishaw	Communications sent to orchestrate fraudulent transfer of Judgment Debtor assets to Sebastian Clarke in furtherance of scheme to defraud UBS	DiOrio characterizes assets transferred to Sebastian Clarke as “worthless” but admits that they were not formally valued.
25.	Ex. 82, Email from M. DiOrio, at BC SEN000063 8649 (Mar. 19, 2020)	03/19/2020	Matt DiOrio	Tom Adamczak, Alli Devins	Communications sent to orchestrate fraudulent transfer of Judgment Debtor assets to Sebastian Clarke in furtherance of scheme to defraud UBS	DiOrio forwards the Asset Transfer Agreement to Beecher Carlson and notes, “Not sure if I ever sent this to you guys. Sale of worthless assets agreement.” DiOrio signs the assignment agreement on behalf of Sentinel.
E. The 2019-2020 Fraudulent Ellington Reimbursements						
26.	Ex. 73, Email from A. Devins at BC SEN000073 0549 (Dec. 17, 2019); Ex. 74, Email from M. DiOrio at BC SEN000071 2799 (Dec. 17, 2019)	12/17/2019	Matt DiOrio	Tom Adamczak	Communications sent to expend Judgment Debtor assets by fraudulently reimbursing Ellington’s personal expenses in furtherance of scheme to defraud UBS	DiOrio, at Ellington’s direction, sends wire transfer information and requests that Sentinel reimburse Ellington \$21,557.04 under the ATE Policy for “travel and business meetings related to Sentinel.” Devins then responds with a request for Ellington’s address to process the reimbursement.

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27.	Ex. 75, Email from T. Adamczak, at BC SEN000066 3342 (Dec. 20, 2019)	12/19/2019	Sara Goldsmith (Executive Assistant to Ellington)	Matt DiOrio	Communications sent to expend Judgment Debtor assets by fraudulently reimbursing Ellington's personal expenses in furtherance of scheme to defraud UBS	Sara Goldsmith, at Ellington's direction, sends fraudulent reimbursement requests for Ellington's personal expenses to be paid pursuant to the ATE Policy. These expenses include \$42,324.00 spent in one night at the strip club Sapphire, \$97,706.19 at the nightclub OMNIA, and \$157,855.47 at the Wynn Hotel and Casino. DiOrio forwards to Beecher Carlson. Ellington admitted that the expenses at OMNIA and Sapphire related to a party for a real estate brokerage firm that had "worked out and disposed of" hundreds of millions of dollars of real estate for HCM. Ex. 117, Ellington Dep. 369:6-18 (Oct. 19, 2022). The following day, Adamczak forwards the request to Devins.
28.	Ex. 77, Email from M. DiOrio, at BC SEN000071 3384 (Jan. 2, 2020); Ex. 78, Email from CIBC Bank, at BC SEN000000 4328 (Jan. 6, 2020)	01/02/2020	Matt DiOrio	Tom Adamczak	Communications sent to expend Judgment Debtor assets by fraudulently reimbursing Ellington's personal expenses in furtherance of scheme to defraud UBS	DiOrio, at Ellington's direction, sends fraudulent reimbursement expenses to Beecher Carlson to have Sentinel reimburse Ellington \$43,353.54 for a private jet to travel to Toronto for work on the "settlement for the ATE matter." Later, Ellington admitted that the Toronto trip only related to Sentinel because they were seeking to issue new insurance policies. Ex. 117, Ellington Dep. 366:8- 368:11. The reimbursement was approved and a wire confirmation attached.

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29.	Ex. 80, Email from A. Devins, at BC SEN000072 7319 (Feb. 6, 2020)	1/31/2020	Matt DiOrio	Tom Adamczak; Alli Devins	Communications sent to expend Judgment Debtor assets by fraudulently reimbursing Ellington's personal expenses in furtherance of scheme to defraud UBS	DiOrio, at Ellington's direction, requests \$176,334.77 fraudulent reimbursement expenses sent to Beecher Carlson for Sentinel to reimburse on Ellington's behalf. Ex. 80 at BC SEN0000727324-26. These expenses included \$78,841.93 for a romantic trip with Ellington's girlfriend marked as "risk mitigation," which Ellington later admitted was a sham. Ex. 117, Ellington Dep. 365:6-10. Devins reports that she will get approval for the reimbursements.
30.	Ex. 81, Email from A. Damien, at BC SEN000077 7504 (Mar. 16, 2020)	3/12/2020	Sara Goldsmith	Matt DiOrio	Communications sent to expend Judgment Debtor assets by fraudulently reimbursing Ellington's personal expenses in furtherance of scheme to defraud UBS	Sara Goldsmith, at the direction of Ellington, sends fraudulent reimbursement expenses for DiOrio to have Sentinel reimburse \$273,662.82 on Ellington's behalf, including \$6,506.50 each in airfare for Kristen Leonardelli, Sara Leonardelli, and Julia Masiello, who have no affiliation with Sentinel. Ex. 81 at BC SEN0000777513-15, -47. In one day in London, Ellington spent \$75,914.86 at two restaurants and a night club. A few days later, Damien responds with approval for the invoices.
F. The 2020-2021 Fraudulent "Dividends" To Mainspring And Montage						
31.	Ex. 62, Email from J. Arbeit, at DISCSEN00 06464 (Oct. 3, 2018)	10/02/2018	Matt DiOrio	Tom Adamczak; Katie Irving	Misrepresentations sent by Enterprise associates to assuage auditors' concerns that Sentinel would not have sufficient loss reserves if dividends were issued during ATE Policy	In response to the auditors' concern that Sentinel would not have sufficient cash reserves, DiOrio commits to "not entertain[] any dividend issuance while the ATE Policy is active." Jonathan Arbeit (Senior Accountant at Beecher Carlson) responds with Sentinel's capital rebalancing schedule.

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32.	Ex. 101, CIBC Bank Statement, at BC SEN000059 8154 (Apr. 30, 2020)	04/24/2020	Sentinel	Mainspring; Montage	Wire transfer sent to pay Ellington and Dondero “dividends” with Judgment Debtor assets in furtherance of scheme to defraud UBS	Despite the representation in row 30 and the fact that a judgment in UBS’s favor had been entered, “dividend” payments were made to Mainspring for \$4.48 million and to Montage for \$1.92 million in April of 2020.
33.	Ex. 85, Email from CIBC, at BC SEN000000 4243 (Apr. 24, 2020 19:01)	04/24/2020	CIBC	Tom Adamczak	Wire transfer sent to pay Ellington and Dondero “dividends” with Judgment Debtor assets in furtherance of scheme to defraud UBS	Wire confirmation from CIBC reflecting a \$1.92 million dividend from Sentinel to Montage on 04/24/2020.
34.	Ex. 84, Email from CIBC, at BC SEN000000 4334 (Apr. 24, 2020 19:02)	04/24/2020	CIBC	Tom Adamczak	Wire transfer sent to pay Ellington and Dondero “dividends” with Judgment Debtor assets in furtherance of scheme to defraud UBS	Wire confirmation from CIBC reflecting a \$4.48 transfer from Sentinel to Mainspring on 04/24/2020.
35.	Ex. 102, CIBC Bank Statement, at BC SEN000061 0180 (Jan. 29, 2021)	01/12/2021	Sentinel	Mainspring; Montage	Wire transfer sent to pay Ellington and Dondero “dividends” with Judgment Debtor assets in furtherance of scheme to defraud UBS	Statement reflecting payments to Mainspring and Montage in January 2021 of \$1,750,000 and \$750,000 respectively.

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36.	Ex. 91, Email from G. Pereira, at BC SEN000008 3961 (Apr. 27, 2021)	04/27/2021	Gareth Pereira (Account Manager at BC Cayman)	Saintvil Leonna (Analyst at CIMA)	Communications sent to cover up the fraudulent issuance of dividends with Judgment Debtor assets in furtherance of scheme to defraud UBS.	Beecher requests that CIMA retroactively approve the issuance of dividends in January 2021 of \$2,500,000.
G. The 2020 Fraudulent Bonus Payments						
37.	Ex. 117, Ellington Dep. at 59:7-60:7 (Oct. 19, 2022)	Summer 2020	Scott Ellington (General Counsel at HCM), Tom Surgent, Frank Waterhouse, Isaac Leventon	Cayman counsel	Communications sent to pay Ellington and others bonuses, which had been blocked by the Bankruptcy Court, with, in part, Judgment Debtor assets in furtherance of scheme to defraud UBS	As he testified in his deposition, Ellington used the interstate wires to create Tall Pine Group, LLC and Sunshine Coast to facilitate fraudulent bonus payments.
38.	Ex. 117, Ellington Dep. at 28:14-29:9 (Oct. 19, 2022)	Summer 2020	Scott Ellington	John Holt (President at NexBank); Matt Siekielski (Chief Operating Officer at NexBank); Brian Mitts (Chief Financial Officer at NexPoint, Highland Funds Asset Management)	Communications sent to pay Ellington and others bonuses, which had been blocked by the Bankruptcy Court, with, in part, Judgment Debtor assets in furtherance of scheme to defraud UBS	As he testified in his deposition, Ellington used the interstate wires to cause various Dondero- and Ellington- affiliated entities to enter into fraudulent consulting agreements with Ellington, Waterhouse, Leventon, and Surgent to facilitate fraudulent bonus payments.

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39.	Ex. 117, Ellington Dep. at 53:12-24, 209:10-18 (Oct. 19, 2022)	Summer 2020	Scott Ellington	Scott Ellington, Frank Waterhouse, Isaac Leventon, Tom Surgent	Wire transfers sent to pay Ellington and others bonuses, which had been blocked by the Bankruptcy Court, with, in part, Judgment Debtor assets in furtherance of scheme to defraud UBS	As he testified in his deposition, Ellington used the interstate wires to fraudulently transfer approximately \$8,638,536.07 to entities affiliated with himself, Waterhouse, Leventon, and Surgent to facilitate fraudulent bonus payments. This included roughly \$5,874,203.21 in Judgment Debtor assets.
40.	Ex. 14, Bk. Claim No. 216 (Mar. 3, 2021)	02/26/2021	Isaac Leventon	Bankruptcy Court	Misrepresentations sent to cover up the fraudulent bonus payments received by Ellington and others in furtherance of scheme to defraud UBS	Leventon filed a proof of claim with the Bankruptcy Court seeking \$687,594.79 in unpaid bonuses without disclosing that he had already received some or all of this amount through other Dondero- and Ellington- controlled entities.
41.	Ex. 15, Bk. Claim No. 244 (Mar. 23, 2021)	03/23/2021	Scott Ellington	Bankruptcy Court	Misrepresentations sent to cover up the fraudulent bonus payments received by Ellington and others in furtherance of scheme to defraud UBS	Ellington filed a proof of claim with the Bankruptcy Court seeking \$3,074,408.16 in unpaid bonuses without disclosing that he had already received some or all of this amount through other Dondero- and Ellington- controlled entities.
42.	Ex. 8, Bk. Claim No. 182 (May 26, 2020)	05/26/2020	Frank Waterhouse	Bankruptcy Court	Misrepresentations sent to cover up the fraudulent bonus payments received by Ellington and others in furtherance of scheme to defraud UBS	Waterhouse filed a proof of claim with the Bankruptcy Court seeking \$2,102,260.99 in unpaid bonuses without disclosing that he had already received some or all of this amount through other Dondero- and Ellington- controlled entities.
43.	Ex. 9, Bk. Claim No. 183 (May 26, 2020)	05/26/2020	Thomas Surgent	Bankruptcy Court	Misrepresentations sent to cover up the fraudulent bonus payments received by Ellington and others in furtherance of scheme to defraud UBS	Surgent filed a proof of claim with the Bankruptcy Court seeking \$3,958,628.14 in unpaid bonuses without disclosing that he had already received some or all of this amount through other Dondero- and Ellington- controlled entities.

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H. The 2020-2021 Misrepresentations About The Solvency Of CDO Fund And HFP						
44.	Ex. 87, Email from I. Leventon, at UBSPROD1 738889, -91 (Aug. 21, 2020)	8/15/2020	Scott Ellington	Greg Demo (Partner at Pachulski Stang Ziehl & Jones)	Promotion of false narrative that CDO Fund and HFP were insolvent in furtherance of scheme to defraud UBS	Ellington misrepresents to Greg Demo that the transferees were “ghost funds” and states that he has represented as much to UBS: “UBS is aware of this situation and I know Andy Clubok knows of this situation because I have personally discussed it with him several dozen times. Including as recently as this year.”
45.	Ex. 116, Ellington Dep. at 137:10- 139:20 (July 29, 2021)	7/29/2021	Scott Ellington	Andy Clubok (Partner at Latham & Watkins)	Promotion of false narrative that CDO Fund and HFP were insolvent in furtherance of scheme to defraud UBS	At his deposition, Ellington agreed with the characterization that he “claimed at the time that those funds were ghost funds,” and said “in substance” that “they had no assets left, but if there was a settlement, that Mr. Dondero could come up with funds from some other source to satisfy a relatively small settlement on behalf of those funds.”